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November 29, 2012

Mr. Tommy Jackson
Central Electric Power Cooperative, Inc.
PO Box 1455
Columbia, SC 29202

Re: NW Anderson-Southern Oconee 115kV Transmission Line & Old Nazareth Cemetery, Anderson County, SC

Dear Mr. Jackson,

As requested, I have examined the documents you provided on the above referenced project and on Wednesday, November 28 I visited the project site. I have also examined the *2002 Historical and Architectural Survey of Anderson County, South Carolina*. I have not, however, examined ARCHsite, nor have I conducted any detailed historical research on the cemetery or its associated church.

The specific question, as I understand it, is whether the proposed right-of-way corridor that abuts the cemetery property on the southwest and southeast is likely to have adverse effects in the opinion of the State Historic Preservation Office (SHPO).

I should first note that the cemetery, while identified by a South Carolina Historical Marker (#4-34), the cemetery was not identified or recorded in the 2002 county-wide survey. Should a more detailed assessment be conducted, this cemetery will need to be recorded as either an archaeological or architectural site.

The only historic site identified in the immediate vicinity is the ca. 1900 structure shown here as Figure 1 and approaching ruinous condition. While a quickly disappearing vernacular style, it was determined not eligible for inclusion on the National Register. Additional farm-related structures on Jolly road to the southeast were not recorded and will need to be should a more detailed assessment be conducted. They are shown in Figure 2 below.

Cemeteries, like other historic sites can be eligible for inclusion on the National Register for association with significant historic events, association with the lives of significant persons, distinctive characteristics of type, period, or other feature, or because they may yield significant



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Figure 1. Anderson County Architectural site 0211 on Jolly Road about 950 feet north-northeast of the cemetery.

historical or archaeological information. It is our view that the cemetery is likely eligible under Criterion D, relating to archaeological significance since the burial ground likely has the potential to make significant contributions to mortuary and bioanthropological archaeology.

Unfortunately, the SHPO has historically sought to rely on South Carolina's antiquated and proven ineffectual S.C. Code of Laws, Section 16-17-600 et seq., *Destruction or Desecration of Human Remains or Repositories*, to protect these sites.



Figure 2. Two farm structures east of site 0211 that, while not currently recorded, will need to be.

Looking at the cemetery setting, it does possess generally sound integrity. Figure 3 reveals that the property is isolated, maintains an intact rural viewshed, and exhibits little intrusion. Although a structure abuts the cemetery property to the north, it is well screened, and standing in the cemetery one has virtually no knowledge of the structure. Likewise, utility lines along Fairplay Road, only 100 feet from the cemetery are hidden by vegetation, even during the winter. Powerlines to the north along Jolly Road are so distant as to be difficult to see.

The cemetery, nevertheless, is in poor condition. Although an effort has been made to "restore" the grounds, stones remain toppled, broken, and displaced.

Condition would have to be considered as fair to poor. It is also difficult to argue eligibility as



Figure 3. Old Nazareth Cemetery. The upper photo shows the cemetery and surround area looking north from the access road. The lower photo shows the area west of the cemetery. The evergreens effectively shield the structure along Fairplay Road from view within the cemetery. Note also that in neither photograph are any of the existing utility lines noticeable.

characteristic of rural, upstate, churchyards under Criterion C since the cemetery is no longer associated with a church.

I would professionally recommend the cemetery as eligible under Criterion D only. Under such circumstances, the placement of a utility line adjacent to the cemetery cannot be considered an adverse effect – at least to the cemetery as a historic site.

There is, however, a greater concern. The deed for the property (Anderson County Register of Deeds, Deed Book 3885, page 288), as well as the associated plat (Anderson County Register of Deeds, Plat Book 1166, page 9-A) provide no historical context. The platted cemetery may, or may not, have historical validity. It of course incorporates the cemetery, but does it incorporate the church and does it incorporate all of the churchyard?

The existing fence at the cemetery has clearly been set with no real knowledge of burials that may be present but unmarked. As a result, it zig-zags around marked graves and likely excludes additional, unmarked graves.



Figure 4. Example of one of several locations where the fence has been shifted outward in order to accommodate a marked grave. It cannot be determined with ground penetrating radar if there are additional burials beyond this marked grave.

If CEPC desires to place utility lines along the periphery of the property, I believe there are two concerns. The first is that no graves are present; the second is that the church remains are not impacted.

I have not compared the location of the spit rail fence surrounding with the graves to the plat, so I am not familiar with the amount of buffer already present.

Graves can be impacted not simply by excavating for the placement of poles, but also by on-going maintenance. In this case, the maintenance is

not likely to be any more damaging than cultivation. Nevertheless, I would not recommend placing poles adjacent to the cemetery without identifying the presence of graves.

To determine the extent of graves I believe the best approach is to conduct a ground penetrating study of the cemetery periphery/corridor of the proposed line. Surface conditions are excellent for such work and there appears to be a high degree of likelihood that a GPR study will be able to identify anomalies consistent with graves.

It will be far more difficult to determine the presence of a church, especially with no historic documents to help narrow the possible search area (the church may even be under the existing structure). In addition, churches tend to have a low density of archaeological remains and are difficult to identify in shovel testing.

We subcontract GPR to a firm in Charleston, GEL Geophysics because of their extensive work on cemeteries, their compliance with ASTM standards, and our belief that they would be appropriate expert witnesses in the case of legal action (which we always consider possible when dealing with the emotionally charged issue of burials). It is likely that the cost for a GPR study of the cemetery would be about \$3,500, based on similar projects in the past. The work would require one-day and would determine if anomalies consistent with burials are present in the area proposed by CEPC for the corridor. The corridor would need to be staked prior to the work and the work will need to take place at a time when the field is fallow and without growth.

An archaeological survey in an effort to identify church remains would best be proceeded by historical research to determine if any historic records can better tie its location down. This would be followed by intensive shovel testing, using 1.5 foot units (larger than typical shovel tests)

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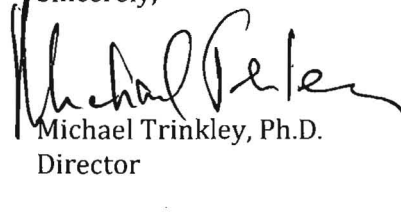
at 20 foot intervals. Assuming we are unable to narrow the suspected area to less than an acre about 120 of these tests will need to be excavated. The cost of this work is likely about \$5,500.

Thus, the effort to clear this issue would entail additional costs of about \$9,000.

I hope that this provides the information you need. If after review you have additional questions please contact me and I'll do my best to assist.

I am enclosing my invoice for the visit to the cemetery and this associated letter.

Sincerely,



Michael Trinkley, Ph.D.
Director

Enclosure: invoice